1 JONATHAN O. PENA, ESQ. CA Bar ID No. 278044 2 Peña & Bromberg, PLC 3 2440 Tulare St., Suite 320 Fresno, CA 93721 Telephone: 559-412-5390 Fax: 866-282-6709 5 info@jonathanpena.com 6 Attorney for Plaintiff 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 Case No. 1:20-cv-01695-EPG EVALYN ANA MENDOZA, 11 STIPULATION AND ORDER FOR Plaintiff, SECOND EXTENSION OF TIME 12 vs. (ECF No. 17) 13 KILOLO KIJAKAZI, Acting 14 Commissioner of Social Security, 15 Defendant. 16 17 18 19 20 IT IS HEREBY STIPULATED, by and between the parties through their respective 21 counsel of record, with the Court's approval, that Plaintiff shall have a 10-day extension of time, 22 from January 14, 2022 to January 24, 2022, for Plaintiff to serve on defendant with 23 PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be 24 extended accordingly. 25 This is Plaintiff's second request for an extension of time. There is good cause for an 26 additional short 10-day extension request. Recently, Attorney Dolly M. Trompeter, an attorney 27 with the firm Pena and Bromberg, PC was unfortunately required to fly out to Texas as her father 28

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1 is very ill, prompting the undersigned Counsel to take on additional matters on her behalf. In 2 additional, Counsel for Plaintiff had for the weeks of January 10, 2022 and January 17, 2022, 24 3 merit briefs, numerous reply briefs, and EAJA Motions. Counsel also has 19 administrative 4 hearings before the Office of Hearing Operations for Social Security. 5 Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any 6 7 inconvenience this may cause. 8 Respectfully submitted, 9 Dated: January 14, 2022 PENA & BROMBERG, ATTORNEYS AT LAW 10 11 By: /s/ Jonathan Omar Pena 12 JONATHAN OMAR PENA Attorneys for Plaintiff 13 14 15 Dated: January 14, 2022 PHILLIP A. TALBERT **United States Attorney** 16 PETER K. THOMPSON 17 Acting Regional Chief Counsel, Region IX Social Security Administration 18 19 By: \*/s/ Oscar Gonzalez de Llano 20 Oscar Gonzalez de Llano Special Assistant United States Attorney 21 Attorneys for Defendant 22 (\*As authorized by email on January 14, 2022) 23 24 25 26 27 28

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## **ORDER**

Based on the above stipulation (ECF No. 17), IT IS ORDERED that Plaintiff shall file Plaintiff's opening brief no later than January 24, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: January 18, 2022 /s/ Euci P. Story
UNITED STATES MAGISTRATE HIDGE